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Consulting Geotechnical Engineers and Geologists

17 West Street • Freeport, Maine • 04032-1133

cc: P. H. H. H.
C. S. S. S.
C. G. G. G. → FNEROBERT G.
GERBER, INC.

W. W. W. W.

207-865-6138

August 27, 1992
File #965Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011Subject: Review of "Proposed Plan, Site 8, Perimeter Road Disposal Site",
August 1992, Naval Air Station Brunswick, Brunswick, Maine.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has reviewed the "Proposed Plan, Site 8, Perimeter Road Disposal Site", dated August 1992, that was prepared by ABB Environmental Services, Inc., for the U. S. Department of the Navy for the Naval Air Station Brunswick, Brunswick, Maine. With the exception of comments 6 and 7, the following comments are intended to draw your attention to changes made in the current document, rather than identify additional issues or concerns.

1. We had reviewed the "Draft Proposed Plan, Site 8, Perimeter Road Disposal Site", dated May 1992, and provided comments in a letter to BACSE dated May 28, 1992. Most of our comments and questions were addressed in the revised August 1992 Proposed Plan referenced above. The Navy also responded to our specific comments in a separate undated written response, a copy of which is enclosed.
2. Page 1-4. In response to comments from the Maine Department of Environmental Protection, the Navy is now proposing to construct a cover for the landfilled waste that is consistent with the State of Maine performance requirements for an "attenuation", or unlined, landfill. In the May 1992 draft plan, the Navy had proposed a cover that would comply with closure requirements for a "construction/demolition debris" landfill.
3. Page 2-1. The date of the public informational meeting and public hearing mentioned in Section 2.1 has been changed to October 15, 1992. It is our understanding, based on our conversation with Jim Shafer of the Navy's Northern Division, that the date was changed in response to input from local residents who felt they needed more time to review the document prior to the public hearing. The public hearing will provide an opportunity for BACSE members and other concerned citizens to comment on the proposed plan.

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JIM SHAFER

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Page 2, Site 8 Proposed Plan,
File #965, August 27, 1992

4. Page 2-1. The public comment period described in Section 2.2 will provide an additional opportunity for BACSE to submit written comments, questions, and concerns on the proposed plan. As described in Sections 2.4 and 8.9, the Navy will consider and summarize responses to comments made during the public comment period. The Navy's evaluation of community acceptance of the proposed plan will be based on the comments received.

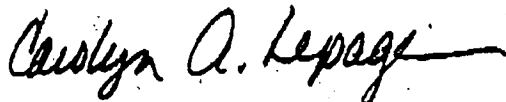
5. Page 6-2. The preferred alternative presented in the August 1992 plan is more involved than the preferred alternative presented in the May 1992 draft plan. The addition of environmental monitoring and institutional controls was made in response to requests and comments by the U. S. Environmental Protection Agency and BACSE.

6. Page 6-6. This comment reiterates the concerns and requested actions raised in comment 9 in our letter to you dated May 28, 1992, concerning the May 1992 draft proposed plan. The institutional controls described in Section 6.0 still do not appear to address BACSE's concerns for limiting access to, and restricting land use of, Site 8 should the Navy no longer control the property. The restrictions to future land uses mentioned in Section 7.2 on page 7-1 should be spelled out in the preferred alternative. As discussed at the May 20, 1992, Technical Review Committee meeting, the institutional controls should also include incorporating the location of the site into the Town of Brunswick's computerized database.

7. Page 6-6. The paragraph describing the proposed environmental monitoring mentions chemical analysis of water and sediment samples for inorganic contamination. Given the concerns for polynuclear aromatic hydrocarbons (PAHs) at Site 8, what is the rationale for not analyzing samples periodically for PAHs as well?

If you have any questions concerning the comments above, please do not hesitate to give us a call.

Sincerely,
Robert G. Gerber, Inc.



Carolyn A. Lepage, C.G.
Director of Operations

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